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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JAJUAN KARLAN JACKSON,

Plaintiff,

vs.

HYUNDAI CAPITAL AMERICA, INC.,  
a Foreign Corporation,

Defendant.

Case No. 2:20-cv-02295-APG-DJA

**JOINT STIPULATION FOR  
EXTENSION OF TIME FOR  
DEFENDANT TO FILE RESPONSIVE  
PLEADING**

**(SECOND REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and LR IA 6-1, Defendant Hyundai Capital America (“HCA”) and Plaintiff Jajuan Karlan Jackson (“Plaintiff”) (collectively, “parties”), through their respective attorneys, respectfully request that the Court extend the deadline in which HCA has to answer or otherwise plead to Plaintiff’s Complaint.

**STIPULATION**

1. **Whereas**, Plaintiff’s Waiver of Service of the Summons was filed on February 1, 2021 (ECF No. 1);
2. **Whereas**, after executing a waiver of service, HCA’s deadline to respond to the Plaintiff’s Complaint was April 19, 2021;
3. **Whereas**, HCA filed an unopposed motion to extend its deadline to respond to Plaintiff’s Complaint, seeking an extension by 21 days through and including May 10, 2021 (“First Request”) (ECF No. 5);

1           4.       **Whereas**, this Court granted HCA's First Request to extend its deadline to  
2 respond through and until May 10, 2021 (ECF No. 7);

3           5.       **Whereas**, the parties are engaged in negotiating a settlement in this matter;

4           6.       **Whereas**, a further stipulation to extend time for HCA to respond to the  
5 Complaint was inadvertently not filed in a timely manner on or before May 10, 2021;

6           7.       **Whereas**, the parties hereby stipulate that there is good cause that the stipulation  
7 be accepted by the court, specifically, that (1) the delay in filing an answer was the result of  
8 excusable neglect based on an intent to settle the matter before a response to the Complaint is  
9 necessary, and is not the result of willful conduct or gross neglect on the part of HCA, (2) the  
10 Plaintiff and, respectfully, the Court will not be prejudiced by the delay, and (3) the parties are  
11 engaged in negotiating settlement and are hopeful that that matter will be resolves prior to HCA  
12 incurring further legal expenses on filing a responsive pleading, which instead can be diverted to  
13 settlement efforts.

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1           **Now therefore**, and pursuant to Fed. R. Civ. P. 6(b)(1)(A), the parties hereto jointly move  
2 to extend HCA's deadline to respond to the Plaintiff's Complaint by 14 days, until **May 24, 2021**.

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5 Dated: May 12, 2021

/s/ Matthew R. Tsai  
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*Attorneys for Hyundai Capital America*

11  
12 Dated: May 12, 2021

/s/ Erik W. Fox  
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*Attorneys for Plaintiff*

18  
19 **ORDER**

20 **IT IS SO ORDERED**

21   
22 United States Magistrate Judge

23 Dated: May 13, 2021